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August 3, 2005

Jim Riddle, Chair of NOSB c/o Ms. Francine Torres USDA-AMS-TMD-NOP 1400 Independence Ave., SW Room 4008-S, Mail Stop 0268 Washington, DC 20250-0200 USDA WATIONAL ORGANIC PROGRAM

Dear Mr. Riddle,

Audubon California's Landowner Stewardship Program works with farmers and ranchers in northern California on habitat restoration projects compatible with existing agricultural operations.

We are pleased to support the biodiversity amendments to National Organic Standards Board's model Organic System Plan (OSP). Since the requirement for biodiversity conservation is already in the National Organic Program rule, the NOSB's approval will provide consistent guidance to farmers, inspectors, certifiers and accreditation auditors. In the future, we expect these additions will spur collaboration of our organization with many organic farmers.

Additions to the OSP can be used in any farm size or situation, to help the farm's natural resources and its bottom line. Organic is a wonderful eco-label, but has not lived up to its full potential. These biodiversity criteria can help raise its value to consumers, and will give additional creditability to the organic industry.

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Sincerely.

Vance Russell

Director